

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS,
FOR THE DISTRICT COURT FOR THE DISTRICT OF DELAWARE, EASTERN
DISTRICT OF VIRGINIA AND/OR OTHER (“THIS COURT”)**

CHELSEA L. DAVIS

v.

LESLIE D. WARE

**NO. _____
JURY TRIAL DEMANDED**

“COMPLAINT” Number 1

I, Chelsea L. Davis (herein referred to as “Chelsea Davis”) am a victim of human trafficking and counsel of “record.” Certain declarations, affidavits, attachments and certificates attached hereto may be attached by me at any time and incorporated by reference herein. I plead the discovery rule as a precaution because any delay from timely filing to present is due to the intentional misconduct of Leslie D. Ware (herein referred to as “Leslie Ware” or “Les” or “Les Ware”) (identified by Texas Bar Card/Law License No. 00785179, born in February 1965), a sexual predator. I incorporate by reference herein additional attachments subsequently attached hereto at any time and incorporated herein.

Dated: June 18, 2015

Respectfully submitted, /s/signature,

/s/Chelsea L. Davis

Chelsea L. Davis

Pro-se and Attorney of Record

TX BAR NO. 24059652

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ATTORNEY, STATE OF TEXAS AND
UNITED STATES OF AMERICA

I, Chelsea L. Davis, file this Complaint against Leslie D. Ware (herein referred to as “Leslie Ware” or “Les” or “Les Ware”) who resides in Dallas County, Texas. Les Ware (whose net worth exceeds \$7,000,000) is a non-party to become party or another upon service, for which third-party or other summonses may issue.

The United States Court of Federal Claims is herein referred to as “this Court.” The United States District Court for the District of Delaware is herein referred to as “this Court.” The United States District Court for the Eastern District of Virginia is also herein referred to as “this Court,” which is the location of the United States Patent and Trademark Office or the location of the Supreme Court, that Court or the United States Supreme Court.

Instead of being a Patent Attorney for the public, the United States Congress says that I am an “employee” contracted by the Department of Defense, my oath to uphold the Constitution is substituted with general employment linguistics, and I have been forced to work without pay for over two years. If the government is contracting/employing my labor and services and using my goods and knowledge and fails to pay me, don’t I have a right to sue the government pursuant to Article III, Section Two of the United States Constitution? In *Chisholm v. Georgia*, 2 U.S. 419 (1793), the Supreme Court ruled that federal courts have the authority to hear cases in law and equity brought by private citizens against states and that states did not enjoy sovereign immunity from citizens.

I certify that at least the following persons and entities have a financial interest in the outcome in addition to myself, which may be amended:

1. The State of Texas, including the Department of Health and Human Services, which may be served by mail to Attorney General Ken Paxton or another at 300 W. 15th St., Austin, TX

78701 or otherwise under the Local Rules of the United States District Court for the Eastern District of Texas.

2. Leslie Ware resides in Dallas County, Texas and has a financial interest as a potential defendant and possible insurance provider of litigation finance fund.
3. I, Chelsea L. Davis, State Bar No. 24059652, am an attorney licensed to practice law in the State of Texas and throughout the United States as a United States Patent Attorney before the USPTO, Reg. No. 63,791.

Regarding jurisdiction and venue, I am a resident of Collin County, Texas, but am currently living in Newark, Delaware, which is the location of records for the United States Patent & Trademark Office and where Leslie Ware and the State of Texas have contacts with the forum state. I reference herein my future application for award to be submitted for fees and other expenses which may show that I am eligible to receive an award. *See* 28 U.S.C. § 2412; 28 U.S.C. § 1491; 28 U.S.C. § 171(a); 28 U.S.C. § 1346(a)(2); 5 U.S.C. § 8101; 15 USC § 1071, which may provide jurisdiction in the Eastern District of Virginia to proceed in a district court *de novo*; and Article XII, Section 16(b) of the “Rules Governing the State Bar of Texas,” which must be interpreted to provide that this Court must enable me to or otherwise file action in the District of Delaware or other court, but Texas seeks to block my access to the Texas courts by threatening to unlawfully arrest me again even though the State lacks plans to prosecute me and instead just plans to hold me in the hopes that I will sign an unconstitutional gag order. This Court may or may not have subject matter jurisdiction with regard to the USPTO’s solicitation of patent attorneys to fill positions of Administrative Patent Judges. I previously applied for the position and believe I am still qualified for the position if I have not yet received that

appointment or yet been vested with it, especially considering this rigorous training program.

This or the underlying “case” or “pending” “litigation” may or may not arise in law and equity because it is intended for court at law under Article Three, Section Two of the United States Constitution or otherwise. U.S. CONST. ART. III, Sec. 2. It appears the Supreme Court of the United States or of Texas shall have original jurisdiction. The “actions” to be made styled _____ v. _____, and *In the Matter of Chelsea L. Davis*, Nos. 1:15-cv-598 and 1:15-cv-608 (opened in the United States Court of Federal Claims or other court on June 12, 2015 and June 15-16, 2015, respectively) are for making the State Disciplinary action and the Federal Disciplinary action against me independently of or consolidated into one, and the certified copies of the “Complaint” at “Document 1” at <https://ecf.cofc.uscourts.gov/doc1/01502000620>, in addition to my Complaints in the United States District Court for the Eastern District of Virginia, derived from my “Complaint” at “Document 1” in *Chelsea L. Davis v. McKool Smith P.C., State Bar of Texas, Baker Botts LLP, Asarco LLC, Leslie D. Ware, PanOptis LLP, Harlan R. Crow, Crow Holdings Capital Partners LLC, Samuel F. Baxter, Mark Werbner, Sayles Werbner P.C., C. Roderick Phelan, Lawrence J. Friedman, Chief Disciplinary Counsel Linda Acevedo, Robin Case, Ben Selman, Susan Farris, Edgar Nace, Jaye Crowder, Eric Aguilar, Dallas County, Collin County, Travis County, The Town of Highland Park, The Town of Addison, Texas Health Presbyterian Hospital Dallas, Southern Methodist University, Angeline Bain, Brian Lidji, Emily Tobolowsky, Jill Willis, Pershing Square Capital Management LP, Hayman Capital Management LP, Carlson Capital LP, Kynikos Associates LP, Omega Advisors Inc., Colt Ventures, and Dallas Cowboys Football Club, Ltd.*, 1:15-cv-00341-SLR (D. Del. opened April 29, 2015) at https://ecf.ded.uscourts.gov/doc1/04302891302?caseid=56999&de_seq_num=40&pdf_header=1&pdf_toggle_possible=1, my “Complaint” at Document 1 in *Chelsea L. Davis v. State of Texas, Supreme Court of Texas, Commission for Lawyer Discipline, Board of Disciplinary Appeals*, 1:15-cv-377 (D. Del. opened

May 11, 2013) and my “Complaint” at Document 1 in *Chelsea L. Davis v. State of Texas, Supreme Court of Texas, Commission for Lawyer Discipline, Board of Disciplinary Appeals*, 1:15-cv-384 (D. Del. opened May 13, 2013), which are each requested to be hereby delivered to this District and to the United States District Court for the District of Delaware, wherein my Texas law license and Texas Bar Card are located. I petition for three-judge panel and en banc consideration of Constitutional argument presented in this “Complaint” No. 1. Relief may or may not be granted by the same panel members as those that hear discipline, and those that hear Constitutional argument, but there is no panel yet.

I took an oath that I will “*support the Constitutions of the United States, and of this State; that I will honestly demean myself in the practice of law; that I will discharge my duties to my clients to the best of my ability; and, that I will conduct myself with integrity and civility in dealing and communicating with the court and all parties. So help me God,*” which I have upheld in full in spite of the repeated misrepresentations I was given by the government. I also have a clear statutory duty of disclosure to the United States Patent and Trademark Office (herein “USPTO”). I complain about my oath, federal guidelines and state guidelines as being inconsistent, which is not my fault. Like the Controlled Substances Act of 1970, these laws violate the United States Constitution, state, federal and international treaties on human rights, civil rights, my right as a person to the state of Texas, my liberties, and all common sense, which can preclude their enforcement on a case-by-case basis or otherwise.

This Court must provide me with an adequate remedy, which may require (1) changing Texas law so that I may continue to practice Patent law before the USPTO; (2) changing USPTO rules and regulations so that I may continue to practice Patent law in the State of Texas; (3) doing away with licensure and admissions requirements to courts; (4) doing away with state

licensure and admissions requirements to bars; (5) harmonizing state and federal licensure and admissions requirements; or (6) get the government off my back because my ability to practice law is my own intellectual property and the government must not interfere with my very thoughts in light of my right to privacy, liberties to work without unwanted interference and right to sue the State of Texas.

Leslie D. Ware (identified by Texas Bar Card/Law License No. 00785179, born in February 1965) is a sexual predator who preys on female lawyers. I was not Leslie Ware's only victim. The State Bar of Texas aided and abetted Leslie Ware to victimize another female lawyer and traffic her on or about 2009. In 2009, Leslie Ware used the the State Bar of Texas, Dallas County District Attorney's Office, Dallas Police Department, and certain judges to pull off his unlawful scheme against his last victim in 2009. Leslie Ware found both of us in 2007 or earlier. I met him in 2010. In 2011, I met another one of his victims. Leslie D. Ware forced her to work. She was Les Ware's slave. Leslie Ware (and the State of Texas) forced me to drink urine, eat feces, raped and beat me, and injected me with lethal drugs without my consent, thereby violating my rights as a person.

Leslie Ware invests in a finance venture using various shell entities organized in Texas and/or Delaware and/or abroad to finance litigation for lawyers by purposely creating the fact scenarios that litigation is made of for a cut of the profits. As an analogy, truck wreck personal injury lawyers are incentivized to vote against lowering the speed limit. A bad lawyer like Leslie Ware might go so far as to set a trap for a cut of the profits, like moving a concrete barrier and then being the first person at the scene of the accident to profit off of it. The State Bar of Texas knowingly conceals lawyers' crimes, aiding and abetting the lawyers to commit more crimes,

because litigation is good for lawyers' businesses. The State Bar of Texas concealed sexual predator Leslie Ware's crimes against his 2009 victim knowing that he would strike another female lawyer again, and then keep another set of about twenty law firms in Texas busy for years. Leslie Ware might also underwrite the litigation insurance policy for the State Bar of Texas, thereby disincentivizing it from performing its duties to the public and its minority members. This is why the immunity of governments and governmental officers like myself must be addressed on a case-by-case basis in courts.

Texas Patent Attorney Chelsea L. Davis pleads not guilty to heterosexual sex outside of marriage under Texas Penal Code 25.11, which defines heterosexual sex outside of marriage as a third degree felony, because that is not an enforceable law on my person and being a victim of human trafficking provides me with an affirmative defense in addition to the following.

1. Human Trafficking Under Federal Law

Each of the foregoing paragraphs 1-6 is incorporated herein by reference. Leslie Ware is a sexual predator who sexually abused me from 2010 to 2012. 18 U.S.C. § 1595; 18 U.S.C. § 1593A. The State Bar of Texas should suspend his law license. Leslie Ware engaged in a commercial sex act when he had sex with "Erin" and paid "Erin" for sex, which directly and proximately caused harm to his victim when their sex caused his victim to become infected with the Human Papilloma Virus. The parent corporation State of Texas is at least negligent for failing to prosecute him under state and common law.

Chelsea Davis asks this Court for a jury trial. Each of State of Texas and United States seek judgment against Leslie Ware and State of Texas for monetary relief to be paid to Chelsea Davis. I seek judgment against Leslie Ware for fees and costs to be disgorged and awarded to

Chelsea L. Davis from the numerous law firms who have been paid by Leslie Ware and disgorgement of State Bar of Texas insurance premiums to Leslie Ware to be paid to me. In sum, I pray for an outcome of the addition of the estimated \$6,000,000 to my net worth. Leslie Ware had prior malice and intent to harm Chelsea Davis in 2009 before I met him, and the State Bar of Texas aided his actions by concealing his criminal past and the records of his 2009 victim.

Chelsea Davis demands a jury trial and evidentiary hearing, including opportunity to show cause as to why the State Bar of Texas should be compelled to allow attorneys to sue other attorneys for personal injuries and thereby compel them to be disciplined by the State Bar of Texas and give people like myself a refund.

As a United States Patent Attorney, I seek an order stating that admission to the Bar of this Court is not required, and thus certain laws do not apply to me. Federal courts must compel action by state officers, including state judicial officials, and the Eleventh Amendment to the United States Constitution is in conflict with Article Three, Sections One and Two of the United States Constitution.

If I am a “judge” under the meaning of Article Three, Section One of the United States Constitution, as such, I “shall, at stated times, receive for [my] services, a compensation, which shall not be diminished during their continuance in office.” U.S. CONST. ART. III, Sec. 1. This means that my compensation is over \$10,000,000 per year and not taxable, especially in light of my ten percent cut of the verdict in *Smartflash LLC, and Smartflash Technologies LLC v. Apple Inc.* 6:14-cv-447 (E.D.Tex. filed 2013) of \$532,000,000, which I am owed, in addition to every dollar McKool Smith P.C. has ever made.

The Eleventh Amendment to the United States Constitution along with Article Three,

Section Two, and the Tenth Amendment imply that I am a person of the people (which I am according to Native American Law) and thus I can sue Texas in any court in America under Constitutional original jurisdiction because I am a citizen, legal resident, native American and other. If Congress did not get to that, then I get to sue Texas over and over in the United States Supreme Court, the Texas Supreme Court or any other court. If people/alter-ego's do not consent to jurisdiction that the states' courts do not already have, then how can the federal government imply or decree that jurisdiction unless both myself and the state consent? Under Art. II, Sec. Two, I may be appointed but not yet vested. If the United States Constitution, common law or other source did not give Congress the power to make states immune from suit by its own citizens in federal court, then how can the Supreme Court or any other court by rule immunize a state from suit in federal court, like by making up a rule that all members of a bar be officers of a court or vice versa? It cannot. What about minority members? And what about the people? This is the precise power and right of the people, that is, to sue their state in the Supreme Court, especially when the state tries to deprive them of their right to sue. I have not committed any crimes, I have not committed treason and there is no suggestion or allegation of such against me. But the State of Texas tortiously interfered with my privacy, my right to sue state officers, my right to work and harassed me by following me on my phone. Texas's retaliation against me for trying to sue it and its officers by threatening criminal prosecution is absolutely illegal federal human trafficking by Leslie Ware against me, for which the State of Texas aided. Therefore, my state of Texas must hire a new defense lawyer for itself to defend itself in its own name and answer to me for forcing me to work and must pay me as a person the money I am owed of \$100,000,000, cease retaliating against me with its "law enforcement"

activities and stop harassing me.

Can federal courts (state Supreme Court or Supreme Court of the United States) hear a lawsuit against a state or state officials in their own name to enforce state or federal legislation under the Commerce Clause? What if the legislation might be unconstitutional?

Under Fed. Cir. R. 47.4, Texas courts are conflicted and biased due to State Bar of Texas and because the State Bar of Texas fails to prevent billionaire Harlan Crow from paying off Texas judges and lawyers and it appears he has retained all law firms and lawyer legislators in Texas to carry out his sick agenda, like videotaping children without obtaining parental consent for purposes of his child pornography enterprise, which may be the largest in the world with over 265,000 subscribers. Each person has a substantial interest in and deserves to know who paid whom to draft and propose legislation which violates their rights as a person.

Under 28 U.S.C. §§ 1454, which may or may not apply, “accused infringers may not be joined in one action as defendants or counterclaim defendants, or have their actions consolidated for trial.” *Id.*

I seek to obtain advance relief of United States Postal Service vouchers and refunds. When many persons have a common interest in their law licenses, and one of them, for the benefit of all and at his own cost and expense, brings a suit for its preservation or administration, the court in which the suit is brought may order that I be reimbursed my outlay, or by proportional contribution from those who accept the benefits of my efforts. I seek refund/reimbursement compensation. I file copies of the complaint and order of appointment in the district court for each district in which my Texas Bar Card and Texas Law License are located.

I petition the federal court in “pending” “litigation” for a writ to institute state disciplinary “action” or “proceeding” in the United States Supreme Court.

I petition the federal court in “pending” “litigation” for a writ to institute federal disciplinary “action” or “proceeding” in the United States Supreme Court.

A court must provide me with an adequate remedy, which may require (1) taking me off the list of attorneys in Texas so that I may continue to practice Patent law before the USPTO; (2) taking me off the list of attorneys in the USPTO so that I may continue to practice Patent law in the State of Texas; (3) doing away with federal licensure maintenance requirements; (4) doing away with state licensure maintenance requirements; (5) harmonizing state and federal licensure maintenance requirements; (6) get rid of any admissions requirements of individual federal courts; (7) get the government off my back because my ability to practice law is my own intellectual property and the government must not interfere with my very thoughts in light of my right to privacy and liberties to work without unwanted interference; and/or (8) stop violating my right to privacy and rights as a person, including my intellectual property and copyrights outside of what I make public record for people. The internet belongs to people, not government, and you cannot make it yours just because someone files a patent application. What a scam!

CERTIFICATE OF COMPLIANCE

I hereby certify that this document contains 4600 words and complies with the type-volume limitation of the Federal Rules of Civil/Appellate Procedure.

/s/Chelsea L. Davis
Chelsea L. Davis

VERIFICATION AND CERTIFICATE OF ATTORNEY

I, Chelsea L. Davis, state under oath that I have read the above document and certify that

it is true and correct.

/s/Chelsea L. Davis
Chelsea L. Davis

CERTIFICATION

I have reviewed this and conclude that every factual statement herein is supported by competent evidence included in the “appendix” or “record” and absence thereof. I affirm service on, delivery to, notice given to, electronic filing in, and receipt by at least the State of Texas and the United States.

/s/Chelsea L. Davis
Chelsea L. Davis

INTERROGATORY NO. 1. Demand is made upon all named persons and entities and agents therefore (excluding myself) to provide me with an electronic copy—or a description by category and location—of the name and present or last-known residential and employment address and telephone number of each eyewitness to the incident which is the subject of the litigation.

INTERROGATORY NO. 2. Demand is made upon all named persons and entities and agents therefore (excluding myself) to provide me with an electronic copy—or a description by category and location—of the name and present or last-known residential and employment address and telephone number of each person who has knowledge of the facts relating to the litigation.

INTERROGATORY NO. 3. Demand is made upon all named persons and entities and agents therefore (excluding myself) to provide me with an electronic copy—or a description by category and location—of the names of all persons who have been interviewed in connection with the above litigation, including the names and present or last-known residential and employment addresses and telephone numbers of the persons who made said interviews and the

names and present or last-known residential and employment addresses and telephone numbers of persons who have the original and copies of the interview.

INTERROGATORY NO. 4. Demand is made upon all named persons and entities and agents therefore (excluding myself) to provide me with an electronic copy—or a description by category and location—of Identification of all photographs, diagrams, or other representations made in connection with the matter in litigation, giving the name and present or last-known residential and employment address and telephone number of the person having the original and copies thereof.

INTERROGATORY NO. 5. Demand is made upon all named persons and entities and agents therefore (excluding myself) to provide me with an electronic copy—or a description by category and location—of the name, professional address, and telephone number of all expert witnesses presently retained by the party together with the dates of any written opinions prepared by said expert. If an expert is not presently retained, describe by type the experts whom the party expects to retain in connection with the litigation, including:

INTERROGATORY NO. 5. Demand is made upon all named persons and entities and agents therefore (excluding myself) to provide me with an electronic copy—or a description by category and location—of a brief description of any insurance policy, including excess coverage, that is or may be applicable to the litigation, including: (a) The name and address of all companies insuring the risk; (b) The policy number(s); (c) The type of insurance; (d) The amounts of primary, secondary, and excess coverage.

INTERROGATORY NO. 6. Demand is made upon all named persons and entities and agents therefore (excluding myself) to provide me with an electronic copy—or a description by

category and location—of the name, professional address, and telephone number of all physicians, chiropractors, psychologists, and physical therapists who have examined or treated you at any time during the ten year period immediately prior to the date of the incident at issue in this litigation.

INTERROGATORY NO. 8. Demand is made upon all named persons and entities and agents therefore (excluding myself) to provide me with an electronic copy—or a description by category and location—of all income tax returns for the past three years.

INTERROGATORY NO. 9. Demand is made upon all named persons and entities and agents therefore (excluding myself) to provide me with an electronic copy—or a description by category and location—of all documents, electronically stored information, and tangible things that each of named persons and entities herein has in its possession, custody, or control that it may use to support its claims or defenses.

INTERROGATORY NO. 10. Demand is made upon all named persons and entities and agents therefore (excluding myself) to provide me with an electronic copy—or a description by category and location—of a computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

	Hourly Rate	Annual Hours	Annual Lodestar
Chelsea L. Davis	\$ 350.00	2500	\$ 875,000

INTERROGATORY NO. 11. Demand is made upon all named persons and entities and agents therefore (excluding myself) to provide me with, for inspection and copying, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment. Answers to interrogatories No. 1-11 as they are must be answered by the State Bar of Texas and State of Texas and sworn to by verification.

I make proof of service on the State of Texas and on the United States on declaration under federal law as a patent attorney authorized to act on behalf of another. I make this corporate disclosure statement identifying parent corporation of the State Bar of Texas as Texas Bar College and State of Texas, which likely cannot be accurate, and listing publicly held company that owns 10% or more of the corporation's stock, which likely cannot be accurate unless a state is a corporation and can be and hereby is added.

/s/Chelsea L. Davis
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ENDNOTE REGARDING SIGNIFICANCE

Answering the question, which is, "In which court(s) of law, law and equity and equity can a female United States Patent Attorney or Patent Agent who has also been a minority member of the State Bar of Texas file a lawsuit *pro-se*?" is especially important now in light of cases to follow which are not presently before any Court for the limited purpose of questioning the State Bar of Texas, certifying questions to the Supreme Court of Texas and to the United States Supreme Court or otherwise filing suit against the State of Texas as a person in accordance with my right to do so in the Supreme Court.